

## INTEGRITY COMMUNICATIONS

P.O. Box 260154  
Corpus Christi, TX 78426  
(361) 242-1000

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### Contact

Name: Jana Chapa  
Address: P.O. Box 260154 Corpus Christi, TX 78426  
Job Title: Accounts Receivable  
Email Address: [jana@integritycd.com](mailto:jana@integritycd.com)  
Phone: 361-242-1000  
Fax: 361-241-2523

**RE: Appeal of "Administrator's Decision on Invoice Deadline Extension Request"  
dated June 28, 2013**

Appellant: Integrity Communications  
SPIN#: 143018592  
FCC Form 471 Application #: 484065  
FRNs: 1348466 and 1348542  
Funding Year: Funding Year 2005: 7/1/2005 – 6/30/2006

Integrity Communications, (Integrity), wishes to **Appeal** the Administrator's Decision on Invoice Deadline Extension Request dated June 28, 2013. Invoice Deadline Extension request was **denied** for the following:

**"Explanation: Current guidelines and procedures require Invoice Deadline Extension requests to be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring an extension (120 days after the end of the service delivery date). The extension request was not filed in a timely manner, so it is denied."**

We would like to appeal to USAC for reversal of the **denial** decision due to mitigating circumstances beyond our control. Following is a brief explanation of what occurred with Zapata Independent School District relating to the two FRN's referenced above.

As work was completed for each FRN during this particular funding year, invoices were generated and submitted. After these two referenced FRN's had been completed, but before their final invoices were generated and submitted, USAC made a claim that ALL of the FRN's had been illegally done, no further invoices would be paid and the school, in fact, would have to pay all monies back that had been disbursed.

In essence, we were told to do nothing more regarding invoicing completed work. There was an unfavorable ruling handed down to the school in regards to these and other FRN's, which appeared to negate all services delivered.

To further complicate the issue, Zapata ISD's IT Director had been called up to active duty and was in

Afghanistan, in the Army. This caused further delays and confusion for the school district.

Due to the confusion, doubt, uncertainty and fear brought about by USAC's initial ruling and the problems created by all of this, the Invoice Filing Deadline Extension was not filed; which expired in the middle of the on-going investigation and audit.

The school appealed USAC's decision and USAC DID in fact ultimately reverse prior decisions and stated that invoicing could resume. We received notification from USAC (Revised FCDL) in June of 2012 to resume invoicing, which we did promptly, but consequently received notification that the Invoice Filing Deadline Extensions on the two FRN's reference above had not been filed on time.

Please note that a similar incident occurred with another school previous to this one. USAC understood the confusion encountered and the fears and problems associated with claims of wrongdoing audits. When schools are faced with the fear of possibly having to pay back millions of dollars they do not have, it often generates confusion and causes the whole system to shut down; consequently various deadlines are inadvertently and unintentionally missed. USAC waived the Invoice Deadline in this case and allowed an Invoice Deadline Extension to be filed. (See attached referencing Flour Bluff ISD)

We appeal to USAC for an Invoice Deadline Extension of the two FRN's referenced above due to confusion and fear and the reasons listed above, associated with the initial ruling from USAC. The school feared they would be forced to re-pay hundreds of thousands of dollars, which they did not have; thus shutting down their entire processes, as the School District thought all the FRN's were null and void, per USAC's ruling.

Please allow us to file the Invoice Deadline Extension and submit the subsequent invoices so we may finally be paid for services delivered over 6 years ago. Your understanding and compassion for our situation is greatly appreciated.

Respectfully submitted,



Bill Sugarek  
Integrity Communications  
361-242-1000